

REMARKS

In the Office Action, the Examiner requested a copy of the Declaration form, rejected claims 17, 25, 35, 40, 41 and 42 as anticipated by the Suzuki reference, rejected the claims 18, 19, 22, 26 - 34 and 39 as obvious over the Suzuki and Manzer, rejected claims 20 and 23 as obvious over Suzuki and Manzer in view of Henderson, rejected claims 36 - 38 as obvious over Suzuki and Manzer in view of Ishigaki and indicated claims 21 and 24 to be allowable if redrafted in independent form. Additional references are cited of interest without being relied upon.

Declaration Copy Attached

Attached is a copy of the signed Declaration and Power of Attorney form as filed, per the Examiner's request.

35 USC §102(b)

The reference to **Suzuki** discloses a printing system having a laser activated photoconductive drum. The reference recognizes that changes in sensitivity in the photoconductive drum will effect image quality. A control unit is provided to control the intensity of the laser beam that irradiates the photosensitive drum. A graph showing the sensitivity characteristic of the drum is described in col. 2, lines 45 - 65. The reference describes a minimum voltage value that provides "deficient image density because of a deficient potential contrast." A greater quantity of light "provides a sufficient potential contrast which allows one to obtain a clear image." A still greater quantity of light gives thicker image lines "so that the obtained image becomes no longer clear because of insufficient resolution." The reference teaches that the light is regulated to an optimum value to provide constantly clear images.

Thus, while **Suzuki** recognizes that there are different levels of light, only one level of light is "sufficient" and a control is implemented to obtain this optimum value.

The present invention, by contrast, provides at least three different light encoding values. A correction factor for the at least three different light encoding values is provided. Therefore, the present invention as claimed is distinguishable over the cited **Suzuki** reference and thus not anticipated thereby.

35 USC §103(a)

The **Suzuki** reference is discussed above and the same comments apply here.

The **Manzer** reference has been relied upon by the Examiner for correcting light encoding values. Such teaching is not found in **Manzer**, however, since the **Manzer** reference primarily concerns the regulation of the charging potential of the photoconductor. The charging of the photoconductor is a different part of the printing process than the exposure of the photoconductor with light to generate the latent image. Different considerations apply, different objectives are involved and different outcomes are expected, and so one of ordinary skill in this art would not apply the teachings of photoconductor charging to latent image production. In **Manzer**, the current to the charging corotron is regulated so that charge tolerance variations of less than 80 volts is established. A charge sensor in the form of a volt meter is provided to sense the charging potential of the drum. The light control referred to at column 8, lines 36 - 48, is for the discharge lamp 17, which as noted in column 4, ensures that the photoconductor drum is completely discharged prior to charging with the charging corotron. The light mentioned in the cited portions of **Manzer** is not the light for generating the image on the photoconductor.

There is no mention in the **Manzer** reference of three different illumination levels during the formation of an image on the photoconductor drum, as is provided in the present invention. Further, there is no teaching or suggestion of a correction factor to be applied to illumination levels during formation of an image. As such, even the combination of **Suzuki** and **Manzer** do not obviate the invention.

The **Henderson** reference teaches printing multiple colors by charging a substrate to different levels. A charged belt is provided with a latent image with a laser and then a pre-transfer light reduces the attraction of the toner to the belt prior to transfer of the toner image to the paper. Half tone printing exposes some of the pixels in a cell, while black printing exposes all the pixels in a cell. Henderson relies on the effect of toner from exposed areas bleeding into unexposed areas to form intermediate levels of grey. The reference teaches a

formula for discharge ratio but does not provide a teaching of the three light encoding values that is missing from the **Suzuki** and **Manzer** references and so the claimed invention is not obviated by the references even when considered in combination.

The **Ishigaki** reference teaches providing a correction to the bias voltage when a printer has been inactive. By contrast, the present invention provides for implementing a balancing event for the light encoding values when the printer has been inactive. Thus, Ishigaki, even when considered in combination with the **Suzuki** and **Manzer** references, does not suggest the claimed invention.

Thus, the present invention is a non-obvious improvement over the cited prior art, whether considered alone or in combination.

Allowable Claims

Applicants note with appreciation the indication of allowable subject matter in claims 21 and 24.

Additional Art

The additional art cited by the Examiner but not relied upon is noted by the Applicants.

Conclusion

Each of the issues raised in the Office Action have been addressed. Applicants respectfully request favorable reconsideration and allowance of the present application.

Respectfully submitted,



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